

DARREN T. BRENNER, ESQ.
Nevada Bar No. 8386
JARED M. SECHRIST, ESQ.
Nevada Bar No. 10439
AKERMAN LLP
1635 Village Center Circle, Ste. 200
Las Vegas, Nevada 89134
Telephone: (702) 634-5000
Facsimile: (702) 380-8572
Email: darren.brenner@akerman.com
Email: jared.sechrist@akerman.com

Attorneys for Defendant Bank of America, N.A.

UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

ROBERT STEWART

Plaintiff,

v.

BANK OF AMERICA

Defendant.

Case No: 2:19-cv-00699-GMN-NJK

**BANK OF AMERICA, N.A.'S MOTION FOR
EXTENSION OF TIME TO RESPOND TO
PLAINTIFF'S COMPLAINT**

Complaint filed: March 14, 2019

Pursuant to Local Civil rule 6-1(a), defendant Bank of America, N.A. (**BANA**), by and through its attorneys of record, hereby requests an extension through June 3, 2019, for defendant to respond to plaintiff's Complaint. In support, the Parties state as follows:

RECITALS

WHEREAS, plaintiff filed the Complaint on March 14, 2019 (Doc. 1-1);

WHEREAS, on April 24, 2019, BANA removed this matter to this Court, (Doc. 1);

WHEREAS, BANA needs additional time to investigate plaintiff's claims and to respond to the complaint, and accordingly, requests a brief extension through June 3, 2019, in which to respond;

WHEREAS, BANA also requests this brief extension to allow time for the parties to engage in settlement negotiations;

WHEREAS, BANA's counsel reached out to plaintiff via voicemail message on April 25, 2019 requesting the extension and again through a phone call on April 29, 2019, during which plaintiff stated that he would get back to defendant's counsel but has not yet done so;

...

WHEREAS, this request is made in good faith and not for purposes of delaying the ultimate resolution of this case, and the parties will not be prejudiced by this request for extension of time.

DATED this 1st day of May, 2019.

AKERMAN LLP

/s/ Jared M. Sechrist

DARREN T. BRENNER, ESQ.

Nevada Bar No. 8386

JARED M. SECHRIST, ESQ.

Nevada Bar No. 10439

1635 Village Center Circle, Suite 200

Las Vegas, Nevada 89134

Attorneys for Defendant Bank of America, N.A.

IT IS SO ORDERED.

Dated: May 2, 2019

.



Nancy J. Koppe

United States Magistrate Judge